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Attorneys for Defendant
STRAUMANN USA, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

BRET COCHRAN,

Plaintiff,

v.

STRAUMANN USA, LLC,

Defendant.

Case No. 2:22-cv-00768-JAM-DB

**AMENDED STIPULATION AND
ORDER TO MODIFY THE PRETRIAL
SCHEDULING ORDER**

Date of Removal: 05/05/2022
Complaint Filed: 03/07/2022
Trial Date: Not Set

Defendant STRAUMANN USA, LLC and Plaintiff BRET COCHRAN stipulate as follows and respectfully request that the Court modify the pretrial scheduling order (ECF Dkt. No.7) for good cause pursuant to Federal Rule of Civil Procedure 16(b)(4):

1. Plaintiff filed the instant action in the Superior Court of California, County of Placer, on March 7, 2022. Defendant answered and removed the action to the U.S. District Court, Eastern District of California, on May 5, 2022.
2. The parties filed their joint Rule 26(f) report on July 1, 2022, proposing deadlines up to and including trial, and exchanged initial disclosures on August 16, 2022.
3. The parties have since exchanged written discovery and produced relevant documentation but anticipate an additional three months of discovery is needed to develop their respective claims and defenses more thoroughly. The parties are

hopeful that this additional time to complete discovery will yield fruitful settlement discussions in advance of trial. Specifically, the parties expect to have written discovery and depositions completed by March and April 2023, respectively.

4. The parties decided to submit this stipulation after much deliberation, and do not take lightly the inconvenience that a modification may cause to the Court's calendar given trial has already been set for August 28, 2023. However, after meeting and conferring on the subject, the parties do not think they will be able to complete the necessary discovery prior to the cut-off dates.

5. THEREFORE, the Parties stipulate and respectfully request that the Court modify the pretrial scheduling order as follows:

Event	Current Date	New Proposed Date
Last day to disclose experts	December 16, 2022	March 16, 2023
Last day to disclose rebuttal experts	December 30, 2022	March 30, 2023
Discovery cut-off	February 17, 2023	May 18, 2023
Last day to file dispositive motions	March 31, 2023	July 14, 2023
Last day to hear dispositive motions	June 7, 2023	September 12, 2023
Final pretrial conference	July 14, 2023	December 8, 2023
Trial	August 28, 2023	January 22, 2024

IT IS SO STIPULATED.

Dated: December 20, 2022

JACKSON LEWIS P.C.

By: /s/ Harold R. Jones
Harold R. Jones
Gokalp Y. Gurer
Attorneys for Defendant
STRAUMANN USA, LLC

Dated: December 20, 2022

CASTLE LAW: CALIFORNIA
EMPLOYMENT COUNSEL, PC

By: /s/ Lisa L. Bradner
Timothy B. Del Castillo
Lisa L. Bradner
Attorneys for Plaintiff
BRET COCHRAN

ORDER

Pursuant to the parties' stipulation and good cause appearing, the pretrial scheduling order (ECF Dkt. No. 7) is modified as follows:

Event	New Date
Last day to disclose experts	March 16, 2023
Last day to disclose rebuttal experts	March 30, 2023
Discovery cut-off	May 18, 2023
Last day to file dispositive motions	July 14, 2023
Last day to hear dispositive motions	September 12, 2023 at 1:30 PM
Final pretrial conference	December 8, 2023 at 10:00 AM
Trial	January 22, 2024 at 9:00 AM

IT IS SO ORDERED.

Dated: December 22, 2022

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE